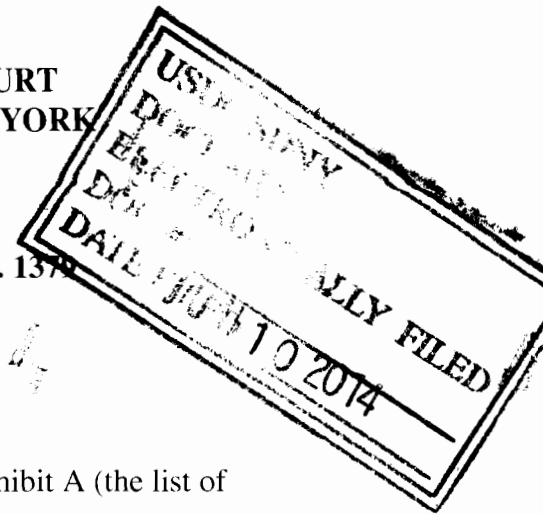


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

_____)
**IN RE LITERARY WORKS IN ELECTRONIC)
DATABASES COPYRIGHT LITIGATION)**
_____)

MDL No. 1379



STIPULATION

Whereas, the Revised Settlement Agreement provides that Exhibit A (the list of "Participating Publishers") may be modified by the defendants up to three days prior to the date on which plaintiffs file their motion for preliminary settlement approval, for the sole purpose of adding publishers to the list of Participating Publishers; and

Whereas, since the date of the plaintiffs' filing of the motion for preliminary approval, several publishers have agreed to participate in the settlement and have participated in the class notice program established by the Revised Settlement Agreement; and

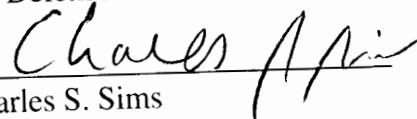
Whereas, defendants seek to have Exhibit A restated to include these publishers in the list of Participating Publishers; and

Whereas, A/B counsel and C counsel do not object to the restatement of Exhibit A to include these additional publishers and have agreed that Exhibit A may be so amended;

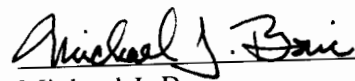
NOW THEREFORE IT IS HEREBY STIPULATED AND AGREED that the attached Exhibit A (list of Participating Publishers) be and hereby is substituted as Exhibit A of the Revised Settlement Agreement.

Dated: June 10, 2014

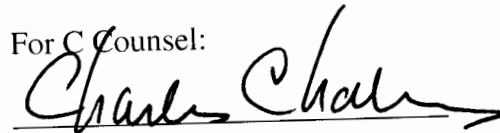
For Defense Counsel


Charles S. Sims
Proskauer
Eleven Times Square
New York, NY 10036

For A/B Counsel:


Michael J. Boni
Boni & Zack LLC
15 St. Asaphs Road
Bala Cynwyd, PA 19004

For C Counsel:


Charles Chalmers
Allegiance Litigation
769 Central Boulevard, Suite 134
Fairfax, CA 94930

SO ORDERED:


George B. Daniels, U.S.D.J.

JUN 10 2014

Dated: _____

In re Literary Works in Electronic Databases Copyright Litigation – Revised Settlement Agreement

Exhibit A: PARTICIPATING PUBLISHERS

1 Advance Publications, Inc.
2 ALM Media, LLC
3 Bloomberg L.P.
4 Capital City Press, L.L.C.
5 Daily News, L.P.
6 Dow Jones & Company, Inc.
7 Forbes
8 Freedom Communications, Inc.
9 Gannett Co., Inc.
10 Gruner + Jahr USA Publishing/Gruner + Jahr USA Group, Inc.
11 Hearst Corporation
12 Herald Media Holdings, Inc.
13 Journal Sentinel, Inc.
14 Landmark Media Enterprises, L.L.C.
15 Madison Newspapers, Inc.
16 New Times Media, LLC
17 North Jersey Media Group/Bergen Record Corp./The Record
18 NYP Holdings, Inc.
19 Press-Enterprise Company
20 TEG New Jersey, LLC (f/k/a Journal of Commerce, Inc.)
21 The Atlantic Monthly Group, Inc.
22 The Copley Press, Inc.
23 The Dallas Morning News, Inc.
24 The Economist Intelligence Unit Limited
25 The Economist Newspaper Limited
26 The McClatchy Company
27 The National Journal Group, Inc.
28 The New York Times Company
29 The Providence Journal Company
30 The San Diego Union-Tribune, L.L.C.
31 The Washington Post Company (for Newsweek)
32 Time Inc.
33 Tribune Publishing Company, LLC
34 U.S. News & World Report, L.P.
35 WP Company LLC d/b/a The Washington Post
36 Aberdeen News Company
37 Forum Communications Company, dba Duluth News Tribune
38 Grand Forks Herald
39 MediaNews Group, Inc.
40 Boston Globe Media Partners LLC
41 The Beacon Journal Publishing Company